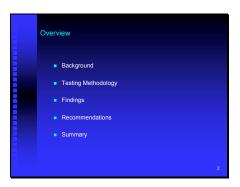


# Slide 2



### Slide 3

# Background 2002: FCC adopted MO&O allowing unlicensed operation of UWB devices in the C-Band downlink frequencies (3700 – 4200 MHz). Several Petitions for Reconsideration filed addressing interference potential of UWB devices for C-Band operations. NTIA Study (NTIA Special Publication 01-43) indicated potential for degradation into GPS service and C-band FSS service. FCC committed to work with FSS industry to perform further interference testing of UWB devices. FCC expressed willingness to take necessary action to protect C-Band services if testing indicated that UWB devices would cause harmful interference to authorized services.

C-Band Coalition Technical Assessment

C-Band Coalition goal: determine ways that UWB and other unlicensed devices can share spectrum and successfully coexist with C-Band satellite services.

C-band Coalition commissioned ALION Science and Technology to model, validate, simulate, quantify, and demonstrate potential effects of UWB and lower adjacent band unlicensed devices on C-Band earth station receivers.

Allon Science and Technology
Wirds Recognized Analysis Facility and Laboratory
Specialist is Reportum Competibility
Many Government and Commercial Projects

#### Slide 5

The Alion Study -- Testing Methodology

Computer Modeling and Simulation

yipical C-Band deployment

currently-approved (Part-15) UWB power levels

Laboratory Testing to verify and validate the model and performance

C-Band transmissions

WWB signal source

Test parameters more robust than prior studies and chosen to approximate real-world conditions

#### Slide 6

Alion Test Parameters for UWB Devices

A. Modeled with isotropic antennas

B. Modeled to simulate network traffic using random factor to simulate devices transmitting, devices receiving

C. Power levels did not exceed FCC-permitted levels, random factor simulated UWB devices propagation in relation to C-Band receiver

D. Propagation was modeled by simulating free space, foliage attenuation, and building attenuation

E. Devices varied with mantomized factor in X, Y, and Z location distributions around C-Band receiver

J. Oneter suchial common production of the commo

Alion Test Parameters for C-Band Receivers

A. Earth station elevation angles varied from 5° to 15°

B. Link budgets used necessary 3 dB margin above freeze frame threshold; maintained constant noise temperature at low elevation angles

C. Typical modulation

• Analog FM-TV

• Digital GPSK, 8PSK

# Slide 8

Laboratory Testing

Perform validation of receiver models versus selected UWB and lower adjacent band interfering signals.

Vary C-band receive signal parameters and interfering signal parameters to determine point where the picture ceased to be usable (e.g., freeze frame or black screen for digital video service).

UWB signal source: Multispectral Solutions Model TFP1001

dithered and undithered

### Slide 9

Modeling and Simulation Results

Analog and Digital signals are vulnerable to UWB interference.

BPSK, which is necessary for HDTV and only about 2 dB more sensitive than QPSK, will be most affected by UWB.

UWB interference will be a function of the density of devices.

Laboratory Findings	
<ul> <li>C-Band reception failure commences when UWB devices operate at or above a density of 0.8 devices per acre within a five kilometer radius of C-Band earth stations.</li> </ul>	
Scope of interference will depend on     Elevation angle of C-Band earth station receiving television and radio signals from various satellites     Density of UWB consumer devices	
<ul> <li>Even at higher elevation angles (15°), reception failure still occurs when UWB density reaches levels that are far below what is likely to be encountered.</li> </ul>	
Effect on consumers: loss of digital television and radio reception; interference to analog television reception.	

# Slide 11

Density Expectations of UWB Consumer Devices

The contribution of interference from UWB public safety devices is negligible and of no concern since the density is many orders of magnitude below the consumer devices.

WWB consumer devices are expected to reach a density similar to that of common wireless-based consumer items - cordess phones
wireless computers
handheld multimedia devices

# Slide 12


Precedent for anticipation of rapid growth in density of UWB consumer devices

Pos in US HH grew from 42% to 51% (1998 – 2000)

US HH with internet access grew from 26.2% to 41.5% (1998 – 2000)

Cordless telephones grew from 11% to 81% of US HH (1985 – 2002)

Cellular telephones grew from 0.1% to 56% of US HH (1985 – 2002)

Cellular telephones ubscribers grew from 11M to over 140M (1992 – 2002)

Population in major metropolitan areas (1-5 million) grew by 19% during 1990s

Typical urban population and housing densities indicate a potential market for household UWB applications far above the critical level indicated by analyses

# Slide 14

Elevation Angles and Population Densities were analyzed for six C-Band satellites

• AMC-8 at 139" W.L.

• AMC-7 at 137" W.L.

• SATCOM C-4 (AMC-10)) at 130" W.L.

• Galaxy IR (Galaxy XVI) at 130" W.L.

• Galaxy IR (Galaxy XVI) at 130" W.L.

• AMC-3 at 87" W.L.

> Satellites at these orbital locations provide large quantity of television and radio distribution.

• FCC assigned satellites to 131"-130" to provide video services to all 50 states.

• Certain portions of the orbital are are fully-occupie programming replacements.

• Program networks and effiliates have upwards of 100,000 C-Band anternas pointed at these locations.

• Many program networks and effiliates have upwards of 100,000 C-Band anternas pointed at these locations.

#### Slide 15



Alion Study demonstrates destructive interference to C-Band television and radio reception

When UWB consumer device densities reach 0.8 per acre, destructive interference will occur to television and radio program services at low elevation angles (5°)

Northeast
Auska
Hawaii

Even at higher elevation angles, television and radio reception failure will occur at UWB densities far below the projected densities

# Slide 17

[Insert Evans' maps (3 slides: AK, HI, N.E.)]

### Slide 18

Summary

Distribution and density of UWB consumer devices will determine impact of interference on C-Band television and radio program reception.

It is difficult to predict or control the adoption rate of new UWB consumer devices, but history suggests a ubiquitous deployment in a short period of line.

The C-Band Coalition is concerned about the likelihood of new UWB consumer devices causing significant interference to television and radio program reception.

C-Band is the predominant means of television and radio satellite distribution.

C-Band industry is heavily invested with long-term commitments by program retworks and MVPDs.

If precautions are not taken now to minimize the risks of interference.

• television and radio service could be severely disrupted.

• the C-Band industry will encounter furnimountable difficulty and expense trying to remedy the problems.

Recommendations to Mittigate the Risks of Interference

Require high density UWB consumer devices (if they must operate at the emission power contemplated in the FCCs rules) to be designed to emit in other frequency bands (e.g., C-Band uplink band 9825-4425 MHz).

If high density UWB consumer devices must operate in the C-Band receive frequencies, require devices to reduce emissions below the power level contemplated in FCC rules.

We believe a 21 dB power reduction is appropriate.

Should prevent reception failure up to UWB density of - 64 devices per acre

Require high density UWB consumer device manufacturers to certify that the emission level into the C-band is within the new limit.

No changes to rules with respect to public safety devices.

# Slide 20

